

# **EXHIBIT C**

353 N. CLARK STREET CHICAGO, IL 60654-3456

JENNER & BLOCK LLP

August 5, 2022

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**VIA EMAIL**

Patrick M. Collins, Esq.  
King & Spalding LLP  
353 N. Clark Street  
12th Floor  
Chicago, IL 60654

**Re: *Kraft v. United Egg Producers, Inc.*, Case No. 11-cv-08808  
Exchange of Objections and Counterdesignations**

Dear Patrick:

Please find attached our objections to Defendants' exhibit list, objections to Defendants' deposition designations, and counter designations. As noted in the Plaintiffs' initial exhibit list and deposition designations, we anticipate filing motions in limine to exclude certain evidence, including evidence created after December 31, 2008. Plaintiffs' counterdesignations and objections are similarly subject to the outcome of such motions. We have counterdesignated some testimony about post-2008 events, and other subjects sought to be excluded in our anticipated motions in limine, but only will seek to introduce that evidence if the Court denies our motions. In addition, we object to the deposition designations listed below in their entirety as irrelevant; we further object to them to the extent defendants seek to introduce 30(b)(6) testimony by non-parties against the Plaintiffs in this case.

**Plaintiffs' Designation Objections:**

Gregory Bates, Publix  
Karen Brown 30(b)(6) FMI  
Ramesh Daga 30(b)(6) Conopco  
Brian Dowling 30(b)(6) Safeway  
Jill Hollingsworth 30(b)(6) FMI  
Sage Horner, Fresh Thyme  
Michelle Kamzalow, Heinz  
Thomas Klump, Kroger  
Thomas Langan, Conopco  
David Lawrence, Safeway

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Virginia Littlefield 30(b)(6) Safeway  
Paul Moran 30(b)(6) Giant Eagle  
Robert Pontius 30(b)(6) Albertsons  
Terry Profitt, Cargill  
Payton Pruett, Kroger  
Robert Randall, Midwest Food  
William Rehm 30(b)(6) Daybreak Foods  
Beth Schnell 30(b)(6) Sparboe  
Beth Schnell 30(b)(6) Sparboe  
Norm Stocker, Cargill  
Gary Stull, Kroger  
James Wilson, Publix

We reserve the right to object to the summary exhibits listed on your exhibit list, and note that many of these exhibits were not included in your exchange.

Lastly, we noticed a few housekeeping issues: (1) our initial Manion designation had two colors, which we have revised in the attached to include only light blue highlighting; (2) you submitted a number of designations using the color pink (we continued to indicate our counterdesignations in orange); and (3) we included highlighted designations for Hodges in our initial exchanges but the page lines were omitted from our excel. Ms. Mahan flagged this last issue and we sent her our excel designations yesterday, but please see the attached revised initial designations to reflect the same.

Regards,

*/s/Brandon Fox*

Brandon Fox

Attachments

cc: For Plaintiffs:

Terrence J. Truax, Esq.  
Joel T. Pelz, Esq.  
Angela M. Allen, Esq.  
Amy M. Gallegos, Esq.  
James T. Malysiak, Esq.

For Defendants:

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